

1 GAYLE A. KERN, ESQ.
Nevada Bar No. 1620
2 KAREN M. AYARBE, ESQ.
Nevada Bar No. 3358
3 LEACH KERN GRUCHOW
4 ANDERSON SONG
5 5421 Kietzke Lane, Ste. 200
6 Reno, Nevada 89511
7 Tel: (775) 324-5930
8 Fax: (775) 324-6173
Email: kayarbe@lkglawfirm.com
*Attorneys for Sunrise Villas Condominium
Homeowners Association*

9 UNITED STATES DISTRICT COURT

10 DISTRICT OF NEVADA

11 U.S. BANK TRUST, N.A., AS TRUSTEE,
12 FOR LSF8 MASTER PARTICIPATION
13 TRUST,

14 Plaintiff,

15 v.

16 SUNRISE VILLAS CONDOMINIUM
17 HOMEOWNERS ASSOCIATION, a domestic
non-profit coop corporation without stock;
18 Does 1 through 10; and Roe Corporations 1
19 through 10,

20 Defendants.
21 _____ /

Case No.: 3:18-cv-00480-HDM-CBC

**STIPULATION AND ORDER TO
EXTEND DEADLINE FOR SUNRISE
VILLAS CONDOMINIUM
HOMEOWNERS ASSOCIATION TO
RESPOND TO COMPLAINT**

[Second Request]

22 ***IT IS HEREBY STIPULATED*** between Plaintiff, U.S. Bank Trust, N.A., as Trustee, for
23 LSF8 Master Participation Trust ("USB"), by and through its counsel, Wright, Finlay & Zak, LLP,
24 and Defendant, Sunrise Villas Condominium Homeowners Association (the "Association"), by
25 and through its counsel Leach Kern Gruchow Anderson Song, to extend the deadline for the
26 Association to answer or otherwise respond to USB's Complaint up-to-and-including December
27 10, 2018.
28

1 USB filed its Complaint on or about October 8, 2018, and the Association was served on
2 or about October 16, 2018. Pursuant to a stipulated extension approved by the Court on October
3 25, 2018 (DE 7), the current deadline for the Association to file its responsive pleading to the
4 Complaint is currently on November 19, 2018.

5
6 USB and the Association (collectively referred to as the "Parties") stipulate and agree to
7 extend the deadline for the Association to answer or otherwise respond to the Complaint up-to-
8 and-including December 10, 2018. The Association has tendered the above-entitled matter to its
9 insurance carrier and is still awaiting a determination of whether other defense counsel will be
10 retained on behalf of the Association. In the interim, counsel for the Parties are engaged in good
11 faith settlement discussions, and Association counsel must confer with the Board regarding such
12 discussions. The next Board meeting is scheduled for December 3, 2018. Therefore, good cause
13 exists for a second extension in order to allow time with respect to the insurance tender, and in
14 light of the pending Board meeting on December 3, 2018.

15
16 This is the second request for an extension of time with respect to this matter and is not
17 intended to cause delay or prejudice to any party.

18
19 DATED this 16th day of November, 2018.

DATED this 16th day of November, 2018.


20 **LEACH KERN GRUCHOW**
21 **ANDERSON SONG**

WRIGHT, FINLAY & ZAK, LLP

22 /s/ Karen M. Avarbe, Esq.
23 KAREN M. AYARBE, ESQ.
24 Nevada Bar No. 3358
5421 Kietzke Lane, Ste. 200
Reno, NV 89511
25 Tel: (775) 324-5930
26 Fax: (775) 324-6173
27 Attorneys for Defendant Sunrise Villas
Condominium Homeowners Association

/s/ Rock K. Jung, Esq.
ROCK K. JUNG, ESQ.
Nevada Bar No. 10906
7785 W. Sahara Ave., Suite 200
Las Vegas, NV 89117
25 Tel: (702) 475-7964
26 Fax: (702) 946-1345
Attorneys for Plaintiff U.S. Bank

28 ///


U.S. MAGISTRATE JUDGE
DATED: 11/27/2018

ORDER

IT IS SO ORDERED.

DATED this ____ day of _____ 2018.

UNITED STATES DISTRICT JUDGE

Respectfully Submitted By:

/s/ Karen M. Ayarbe, Esq.

KAREN M. AYARBE, ESQ.

Nevada Bar No. 3358

5421 Kietzke Lane, Ste. 200

Reno, Nevada 89511

Tel: (775) 324-5930

Fax: (775) 324-6173

Email: kayarbe@lkglawfirm.com

Attorneys for Defendant, Sunrise Villas

Condominium Homeowners Association

- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 10
- 11
- 12
- 13
- 14
- 15
- 16
- 17
- 18
- 19
- 20
- 21
- 22
- 23
- 24
- 25
- 26
- 27
- 28

Pursuant to the Fed. R. Civ. Proc. 5(b) and the United States District Court CM/ECF Electronic Filing Procedure IV(B), a true and correct copy of the foregoing ***STIPULATION AND ORDER TO EXTEND DEADLINE FOR SUNRISE VILLAS CONDOMINIUM HOMEOWNERS ASSOCIATION TO RESPOND TO COMPLAINT*** was transmitted electronically through the Court's e-filing electronic system to the attorney(s) associated with this case.

esmith@wrightlegal.net
tsessions@wrightlegal.net
NVefile@wrightlegal.net

/s/ Christine A. Lamia
An Employee of Leach Kern
Gruchow Anderson Song

/s/ Christine A. Lamia
An Employee of Leach Kern
Gruchow Anderson Song